

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI

IN RE:

CHAPTER 13

JESSICA L. SIMMS

CASE NO. 17-14487-JDW

MOTION TO MODIFY CHAPTER 13 PLAN

COMES NOW THE Debtor, by and through her attorney of record, and files this, her Motion to Modify Chapter 13 Plan, and in support thereof, would state as follows:

1.

Debtor filed a Petition for Relief under Chapter 13 of the U. S. Bankruptcy Code on or about November 27, 2017 in the United States Bankruptcy Court for the Northern District of Mississippi.

2.

Debtor wishes to amend her Chapter 13 Plan to add S & S Recovery, Inc. as general unsecured claims to be paid as all other allowed general unsecured claims. Trustee shall amend the wage withholding order accordingly.

WHEREFORE, PREMISES CONSIDERED, Debtor prays that this Chapter 13 plan payment be modified accordingly.

RESPECTFULLY SUBMITTED, this, the 7th day of August, 2018.

By: /s/Michael W. Boyd
Michael W. Boyd, P.A. #4216

PO Box 1586
Greenville, MS 38702-1586
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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

IN THE MATTER OF:
JESSICA L. SIMMS

CHAPTER 13
CASE NO. 17-14487-JDW

NOTICE OF MOTION TO MODIFY CHAPTER 13 PLAN

Should any party receiving this notice respond or object to said motion, such response or objection is required to be filed on or before September 6, 2018, with the Clerk of this Court at the following address:

Shallanda J. Clay, Clerk of Court
United States Bankruptcy Court
Northern District of Mississippi
703 Highway 145 North
Aberdeen, Mississippi 39730

and a copy must be served on the undersigned Chapter 13 Trustee. If no responses are filed, the Court may consider said motion immediately after the time has expired. In the event a written response is filed, the Court will notify you of the date, time and place of the hearing thereon.

By: /s/Michael W. Boyd
Michael W. Boyd, P.A. #4216
PO Box 1586
Greenville, MS 38702-1586
662/332-0202
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CERTIFICATE OF SERVICE

I, Michael W. Boyd, Attorney for the Debtor herein, do hereby certify that I have this day electronically filed the above and foregoing Motion to Modify Chapter 13 Plan with the Clerk of the United States Bankruptcy Court using the ECF system which sent notification of such filing to the following:

Office of the United States Trustee
USTPRegion05.AB.ECF@usdoj.gov

Locke D. Barkley
sbeasley@barkley13.com

and I hereby certify that I have mailed by United States Postal Service the document to the following:

S & S Recovery, Inc.
4210 Altruria Road
Suite 131
Memphis, TN 38135

This, the 7th day of August, 2018.

/s/ Michael W. Boyd
Michael W. Boyd, P.A.